



Rio Grande Water Conservation District

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Protecting & Conserving San Luis Valley Water

December 28, 2017

Mr. Dan Dallas
Rio Grande National Forest
1803 US Hwy. 160
Monte Vista, CO 81149
rgnf_forest_plan@fs.fed.us

Re: Rio Grande National Forest Plan Revision

Dear Mr. Dallas:

The Rio Grande Water Conservation District (RGWCD) respectfully submits the following comments on the Draft Environmental Impact Statement (DEIS) and draft Forest Plan for the Rio Grande National Forest (RGNF). In order to ensure a complete record the RGWCD hereby incorporates its comments on an initial draft which we sent to you on October 28, 2016. There is no reason to repeat those comments and the RGWCD wishes to acknowledge the efforts which you and your staff have made to ensure that our earlier comments were addressed. The RGWCD does believe that the underlying explanation of the background and history of our concerns needs to remain a part of your administrative record, so we incorporate our October 28, 2016 letter for this record.

Because the Draft Forest Plan does not seek to alter the manner in which water resources on the National Forest are managed many of our concerns have been addressed. In particular the RGWCD agrees that the proposed adaptive management component of the Plan will allow the RGNF the ability to respond to changes in resource conditions which will allow us to continue discussing appropriate means to continue meeting the Forest planning goals while respecting the existing water resource management regime that exists in the San Luis Valley.

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In particular the RGWCD appreciates the opportunity to meet with you and your staff in order to discuss your proposal to include one new recommended eligible reach for inclusion in the National Wild and Scenic Rivers system. That stream, which was not included in the 1996 Forest Plan, is Deadman Creek. Based on our discussions RGWCD does not oppose this addition because Deadman Creek rises high on the National Forest in the Sangre de Cristo Wilderness and flows generally westerly on Forest Service land where it terminates close to or slightly below the Forest boundary. Including the portion of Deadman Creek within the forest as an eligible reach makes good sense particularly because Deadman Creek does not have any private water rights located within the reach that you have identified. As a result the RGWCD supports the Draft Plan recommendations that twelve (12) stream segments remain eligible and six (6) stream segments remain suitable for consideration under the Wild and Scenic Rivers system as carry-overs from the 1996 Forest Plan and that in addition Deadman Creek be added. This support is offered in the context of and subject to the provisions of the decree in Case 81CW183 which decrees the US Forest Service Federal Reserve water rights. The impact of the decree is more thoroughly discussed in our October 2016 letter.

There are a number of wilderness area proposals contained in the Draft Plan. The RGWCD is concerned with and does not support these proposed additions to the wilderness inventory unless appropriate carve-outs are identified which prevent the inclusion of irrigation ditches that are operated in these areas. It is essential that the owners and operators of these irrigation structures be protected from the often onerous requirements for ditch operation and maintenance that come as a consequence of wilderness designation. In particular it is important that the owners and operators of these ditches be entitled to utilize modern power equipment in conducting ditch maintenance, which would not be permitted if the land adjacent to those ditches were included within a wilderness area.

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A second area of concern, and thus opposition, to the designation of additional wilderness areas in the mountains surrounding the San Luis Valley is the impact that such designations might have on the construction operation maintenance and replacement of various water measurement devices in these areas. We include within this concern the SNOTELS located in proposed wilderness areas as well as the SnoLite systems that have been and are being installed throughout our watershed to permit significantly better water management decision making. To the extent that efforts continue to designate these proposed wilderness areas within the Rio Grande Basin we will strenuously resist the designation unless there is specific provision made to allow the existence of present and future installations of snow and water measuring devices within the wilderness area(s).

Thank you for the opportunity to be part of the Forest Plan Revision process and for your consideration of these comments. Please contact me if there are questions about any of our comments. The RGWCD very much looks forward to continuing our long-standing cooperative efforts with your agency in pursuit of our mutual goal of protecting and enhancing the National Forest lands within the Rio Grande Basin while protecting the rights and interests of the citizens of the San Luis Valley.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cleave Simpson', written in a cursive style.

Cleave Simpson, General Manager
Rio Grande Water Conservation District

Cc: Rio Grande Water Conservation District Board of Directors
David Robbins